

**Gregory Mendoza**  
Governor



**Stephen Roe Lewis**  
Lieutenant Governor

## **GILA RIVER INDIAN COMMUNITY** *Executive Office*

*"A New Generation of Leadership Serving the People"*

March 3, 2014

David Albright, Manager  
Ground Water Office  
United States Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, California 94105-3901

**Re: Government-to-Government Consultation on Proposed Florence Copper Project**

Dear Mr. Albright,

This letter follows yours dated February 7, 2014.

As you know, the Gila River Indian Community and the United States Environmental Protection Agency ("EPA") have been coordinating government-to-government consultation regarding EPA's pending determination on issuing an Underground Injection Control permit to Curis Resources Ltd., owner of the proposed Florence Copper Project. Your letter provides an overview of the history of government-to-government consultation between the Community and EPA on the proposed mining project, and proposes February 28, 2014, as the conclusion of the general government-to-government consultation on the proposed project.

The Community respectfully requests extension of government-to-government consultation with EPA on the Florence Copper Project. First, as your letter acknowledges, there are substantial remaining issues regarding the protection of cultural resources in the area. The Community views this consultation as one process and requests that the government-to-government consultation, whether described as "general" or otherwise, remain open until the Community can be assured that these significant cultural sites are adequately protected. Up to this point, the EPA has considered the NHPA Section 106 process as part of the UIC permitting process.


Additionally, the Community requests at least one additional meeting with EPA and for EPA to provide the Community a status update on the UIC permitting process. As you are aware, the last meeting between the Community and EPA on the Florence Copper Project took place on October 9, 2012, over a year ago. While EPA indicated it would consider re-evaluating the aquifer exemption issued over 15 years ago, the Community has not received information regarding additional EPA activities. In November 2012, the Community did request an additional face-to-face meeting with EPA before a final decision is made, and again makes that request.

As you are aware, the Community has taken a formal position opposing the Florence Copper Project, as expressed in Community Council Resolution GR-49-12 (May 2, 2012), a copy of which is attached to this letter.

We thank you for your coordination and cooperation during government-to-government consultation on the proposed Florence Copper Project. We look forward to hearing from you on our request to extend government-to-government consultation.

Any additional questions or requests may be directed to Thomas L. Murphy, Deputy General Counsel, Office of the General Counsel at [thomas.murphy@gric.nsn.us](mailto:thomas.murphy@gric.nsn.us).

Respectfully,



Gregory Mendoza, Governor  
Gila River Indian Community

**Enclosure: Resolution GR-49-12**

cc: Nancy Rumrill, EPA  
Thomas L. Murphy, OGC  
Barnaby Lewis, THPO